

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA, Plaintiff, vs. KENDRA KINGSBURY, Defendant.	Case No. 21-cr-101-SRB
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**MOTION FOR EXTENSION OF TIME TO FILE OBJECTIONS
TO PRESENTENCE INVESTIGATION REPORT**

Kendra Kingsbury, through counsel, respectfully requests that this Court grant an extension of time to April 7, 2023, to file objections to the preliminary presentence investigation report. In support of this motion, Ms. Kingsbury states the following:

1. On May 18, 2021, an indictment was filed charging Ms. Kingsbury with two counts of willful retention of national defense information in violation of 18 U.S.C. § 793(e).
2. Ms. Kingsbury pled guilty to the indictment on October 13, 2022, and a presentence report was ordered. At that time, sentencing was scheduled for March 16, 2023.
3. The preliminary presentence report issued on February 24, 2023, making objections due on March 10, 2023.

4. The sentencing date has now been rescheduled to June 21, 2023.

5. Additional time is needed to discuss the preliminary presentence report with Ms. Kingsbury and adequately prepare any objections or corrections to the report. So, Ms. Kingsbury requests an extension to April 7, 2023, to complete the objections.

6. The government does not oppose this request. And with sentencing now scheduled for late June, this request will not otherwise interrupt the flow of the proceedings in this case.

WHEREFORE, Kendra Kingsbury respectfully requests this Court grant until April 7, 2023, to file objections to the preliminary presentence report.

Respectfully submitted,

/s/ Marc Ermine
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CERTIFICATE OF SERVICE

It is hereby CERTIFIED that one copy of the foregoing motion was electronically filed on the ECF system on March 2, 2023.

/s/ Marc Ermine
MARC ERMINE